

## **REMARKS**

Reconsideration of the application in view of the foregoing amendment and the following remarks is respectfully requested.

By the present amendment, claims 8-14 have been canceled and claims 15-21 have been added.

Claims 15-21 are pending. Claims 1-14 are canceled.

Based on the foregoing amendments and the following remarks the application is deemed to be in condition for allowance and action to that end is respectfully requested.

The Examiner rejected claims 8 through 14 under 35 U.S.C. § 102(b) as being anticipated by any of Minnerop et al., U.S. Patent No. 5,991,115 (Minnerop) and Wilson, U.S. Patent No. 4,471,642 (Wilson). It is respectfully submitted that claims 15-21 are patentable over both Minnerop and Wilson, claims 8-14 having been canceled.

Specifically, claim 15 recites a mobile platform module for use with different machines in a rolling mill train and having horizontal polygonal platform foundation surface (2) at least some of control units (4), drives (5), drive consoles (5a), distribution blocks (6), valve units (7) mounted on the platform surface and a plurality of supply, discharge, distribution conduits for connecting at least some of

control units (4), drives (5), drive consoles (5a), distribution blocks (6), valve units (7) with respective fixed conduits of a machine (3) associated with respective functional components of the machine. The platform is arranged in proximity of the machine at an adjustable predetermined distance therefrom and at adjustable predetermined, lateral position and height relative to the machine dependent on dimensions of the machine, the at least some of the control units (4), drives (5), drive consoles (5a), distribution blocks (6), valve units (7) are distributed over the platform foundation surface (2) in accordance with functions thereof with regard to the machine.

The new claims are based on the original disclosure and do not contain any new matter. Thus, the specification discloses (page 1, first paragraph) that the platform (platform module) is designed for different machines, in particular, for high-pressure discles, emergency shears, pendulum shears in rolling mill trains, and the like. The specification further discloses that the platform (module) is placed in proximity of the machine at a distance predetermined for the individual machine at corresponding lateral position and a suitable height adapted to the connected machine (please see page 7, first paragraph). From the foregoing, it is clear that platform module has its spacing from the particular machine, and its height and lateral position adjustable dependent on the machine it is used with.

It is respectfully submitted that the foregoing and other novel features of the present invention are not disclosed in either of Minnerop and Wilson. It is noted that in both Minnerop and Wilson, the “platform” ( housings 2a, 3a, 4a) in Minnerop and the “platform” (plate carriage(3)) form part of the respective machine and need not be adjusted at a distance from the machine. Further, in both Minnerop and Wilson the “platform” does not have a horizontal polygonal platform foundation surface on which some components are mounted. Still further, the lateral position and height of the platform in both Minnerop and Wilson are not adjustable dependent on the machine with which it is used. There is no suggestion in either of Minnerop and Wilson that the lateral position and height are adjustable. Finally, none of Minnerop and Wilson have any suggestion for forming a “platform” as a mobile module adapted to be used with different machines.

In view of the above, it is respectfully submitted that neither Minnerop nor Wilson anticipates or makes obvious the present invention as defined by claim 15, and claim 15 is patentable thereover.

In view of the above, it is respectfully submitted that claim 15 is patentable over the prior art and is allowable.

Claims 16-21 depend on claim 15 and are allowable of the same reason claim 15 is allowable and further because of specific features recited therein which,

when taken alone and/or in combination with those of claim 15, are not disclosed or suggested in the prior art.

Thus, claim 18 recites supports (13) extending substantially parallel to the horizontal foundation surface for supporting the drive consoles, the distribution blocks, valve units. No such supports are disclosed and/or shown in any of Minnerop and Wilson.

Claim 20 recites that the horizontal platform foundation surface includes liquid discharge grids and walking-enabling cover sheets. No grids of any kind are shown and/or discussed in any of Minnerop and Wilson and clearly the housings of Minnerop and the carriage of Wilson are clearly not designed for walking over.

Claim 21 recites that the horizontal platform foundation surface is a large flat surface for enabling serving and monitoring different components mounted on the platform. As discussed with respect to claim 20, the housings and carriage are not designed for walking over and are not large enough to provide for serving and monitoring by a person standing on the platform.

In view of the above-discussion, it is respectfully submitted that all of claims 16-21 are allowable.

### **COMMENT**

Attached herewith is an Information Disclosure Statement with which documents cited during the opposition proceeding regarding the European Patent corresponding to the instant application.

It is respectfully submitted that none of the cited document discloses or suggests a platform module for use with different machines. Thus, both HADEED references discloses an assembly with a machine and a platform (M1), i.e., the platform is designed for a particular machine. No other features of the claims 15-21 are apparent from the cited documents.

### **CONCLUSION**

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance, and allowance of the application is respectfully requested.

Should the Examiner require or consider it advisable that the specification, claims and/or drawings be further amended or corrected in formal respects in order to place the case in condition for final allowance, it is respectfully requested that such amendment or correction be carried out by Examiner's Amendment and the case passed to issue. Alternatively, should the Examiner feel that a personal

discussion might be helpful in advancing this case to allowance, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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